

WESTERN DISTRICT OF PENNSYLVANIA - PITTSBURGH

In Re: Case No. 19-24527-TPA

MICHAEL K. HERRON, Chapter 11

Debtor(s).

REQUEST FOR SPECIAL NOTICE AND SERVICE OF COPIES

TO: UNITED STATES BANKRUPTCY JUDGE, THE DEBTOR(S), AND ALL INTERESTED PARTIES

PLEASE TAKE NOTICE that ALDRIDGE PITE, LLP submits this Request for Special Notice and Service of Copies, for Bank of America Mortgage, a Division of Bank of America, N.A. and hereby requests special notice of all events relevant to the above-referenced bankruptcy and copies of all pleadings or documents filed in relation to the above-referenced bankruptcy, including all pleadings or notices under Federal Rules of Bankruptcy Procedure, Rule 2002, the commencement of any adversary proceedings, the filing of any requests for hearing, objections, and/or notices of motion, or any other auxiliary filings, as well as notice of all matters which must be noticed to creditors, creditors committees and parties-in-interest and other notices as required by the United States Bankruptcy Code and Rules and/or Local Rules of the above-referenced bankruptcy court.

ALDRIDGE PITE, LLP, submits this Request for Notice and Service of Copies as agent for Bank of America Mortgage, a Division of Bank of America, N.A. and not as counsel of record.

ALDRIDGE PITE, LLP, requests that for all notice purposes and for inclusion in the Master Mailing List in this case, the following address be used:

Gilbert R. Yabes
ALDRIDGE PITE, LLP
4375 Jutland Drive, Suite 200
P.O. Box 17933
San Diego, CA 92177-0933

Neither this Request for Special Notice nor any subsequent appearance, pleading, claim, proof of claim, documents, suit, motion nor any other writing or conduct, shall constitute a waiver of the within party's:

- a. Right to have any and all final orders in any and all non-core matters entered only after de novo review by a United States District Court Judge;
- b. Right to receive service pursuant to Fed. R. Civ. P. 4 made applicable to the instant proceeding by Fed. R. Bankr. P. 7004. This Request for Special Notice shall not operate as a confession and/or concession of jurisdiction. Moreover, the within party does not authorize ALDRIDGE PITE, LLP, either expressly or impliedly through ALDRIDGE PITE, LLP's participation in the instant proceeding, to act as its agent for purposes of service under Fed. R. Bankr. P. 7004;
- c. Right to trial by jury in any proceeding as to any and all matters so triable herein, whether or not the same be designated legal or private rights, or in any case, controversy or proceeding related hereto, notwithstanding the designation or not of such matters as "core proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial right is pursuant to statute or the United States Constitution;
- d. Right to have the reference of this matter withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and
- e. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to which this party is entitled under any agreements at law or in equity or under the United States Constitution.

Dated: January 23, 2020

ALDRIDGE PITE, LLP

/s/ Gilbert R. Yabes

Gilbert R. Yabes
ALDRIDGE PITE, LLP
4375 Jutland Dr., Suite 200
P.O. Box 17933
San Diego, CA 92117-0933